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 11 Jr.

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

ASHLEY PARHAM, JANE DOE, and
 JOHN DOE,

Plaintiffs,

vs.

SEAN COMBS a/k/a “P. Diddy,” “Puff Daddy,” “Love,” “Puffy” and “Diddy,” KRISTINA KHORRAM, SHANE PEARCE, RUBEN VALDEZ, JOHN PELLETIER, ODELL BECKHAM JR., DREW DESBORDES a/k/a “Druski,” JACQUELYN WRIGHT a/k/a “Jaguar Wright”, HELENA HARRIS-SCOTT, MATIAS GONZALEZ, BRANDI CUNNINGHAM, JANICE COMBS, KEITH LUCKS a/k/a “Big Homie CC,” and JOHN and JANE DOES 1-10,

Defendants.

Case No. 3:24-cv-07191-RFL

**DECLARATION OF AJAY
 SANGHA IN SUPPORT OF
 MOTION OF ODELL BECKHAM
 JR. FOR THE IMPOSITION OF
 SANCTIONS AGAINST
 PLAINTIFFS AND THEIR
 COUNSEL PURSUANT TO FED. R.
 CIV. P. 11; MEMORANDUM OF
 POINTS AND AUTHORITIES**

Judge: Hon. Rita F. Lynn

Date: October 14, 2025

Time: 10:00 a.m.

Crtrm.: 15

Judge: Hon. Rita F. Lin

Trial Date: None Set

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Case No. 3:24-cv-07191-RFL

DECLARATION OF AJAY SANGHA

I, Ajay Sangha, declare as follows:

3 1. I am over the age of 18, and have personal knowledge of the matters set
4 forth herein. If called upon and sworn as a witness, I could and would competently testify
5 to the matters set forth herein.

6 2. I am a friend and business associate of Odell Beckham, Jr. In 2018 I was,
7 among other things, his personal assistant. In my capacity as Mr. Beckham's personal
8 assistant, I lived with him at a house on Solar Drive in Los Angeles during the summer
9 of 2018.

10 3. While staying in Los Angeles, if Mr. Beckham and I were to go out, he
11 would hire a car service - Red Limo Line, LLC ("Red Limo") - to drive us. Grigor
12 Vahanyan, who I understand to be the owner of the car service, would drive us, and if we
13 were going out with multiple people and needed additional cars, Red Limo would provide
14 an additional driver.

15 4. On March 22, 2018, Mr. Vahanyan drove me and Mr. Beckham to various
16 locations in the Los Angeles area, including the Velo Sports Center in Carson, CA where
17 Mr. Beckham had a training session. We returned home to Solar Drive at approximately
18 6:00 p.m.

19 5. Mr. Beckham decided that he wanted to stay in that evening, and invited
20 Jeremy Hill to hang out with us to play video games.

21 6. Attached as Exhibit “A” is a screen capture from a video taken that evening
22 by Mr. Beckham, Jr. In the video you can see me and Mr. Hill. The video was taken at
23 10:02 p.m., and Mr. Hill stayed for several hours before leaving that night.

24 7. Mr. Beckham and I remained at Solar Drive until approximately 2:30 p.m.
25 the following day, March 23, 2018, when Mr. Vahanyan picked us up to go to another
26 training session.

27 8. On the evening of March 23, 2018, Mr. Beckham and I went out to eat and
28 to various bars in the Los Angeles area. We returned home to Solar Drive at

1 and to various bars in the Los Angeles area. We returned home to Solar Drive at
2 approximately 4:30 a.m.

3 9. The following morning, we left the home on Solar Drive at 9:30 a.m. to
4 go to Santa Monica Beach where Mr. Beckham worked out with his personal trainer,
5 Jamal Liggin.

6 10. Attached hereto as Exhibit "B" is a true and correct copy of a photograph
7 I took of Mr. Beckham's dogs at the Santa Monica beach while I was waiting for him
8 to complete his work out. Also attached as part of Exhibit B is a screenshot of the
9 Metadata of the photograph.

10 I declare under penalty of perjury under the laws of the United States of
11 America that the foregoing is true and correct.

12 Executed on this 24th day of April, 2025, at Los Angeles, California.

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Ajay Sangha (Apr 24, 2025 14:16 PDT)

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Decl of Ajay

Final Audit Report

2025-04-24

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"Decl of Ajay" History

-  Document created by Andrew Jablon (ajablon@rpblaw.com)
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-  Document emailed to ajay@████████.com for signature
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-  Email viewed by ajay@████████.com
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-  Signer ajay@████████.com entered name at signing as Ajay Sangha
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Signature Date: 2025-04-24 - 9:16:03 PM GMT - Time Source: server
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